

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	)	
	)	
<b>JOSEPH GRASSO,</b>	)	<b>Civil Action No. 2:13-cv-04308-CMR</b>
	)	
<b>Appellant/Debtor.</b>	)	

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**MOTION FOR LEAVE TO SUPPLEMENT INDEX OF RECORD ON APPEAL**

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Appellee, Madison Capital Company, LLC ("Madison"), by and through its counsel, respectfully submits this Motion for Leave to Supplement the Index of Record on Appeal.

Madison seeks to supplement the index of record on appeal to include the memorandum opinion dated July 11, 2013, issued in conjunction with the order converting the case to Chapter 7 (the "Memorandum Opinion"). The Memorandum Opinion was issued in support of the order dated June 12, 2013, which is the order being appealed in this case.

Rule 8006, Federal Rules of Bankruptcy Procedure, provides that "[t]he record on appeal shall include . . . any opinion, findings of fact, and conclusions of law of the court." Accordingly, the Memorandum Opinion should have been included in the record transmitted to this Court, but it was not.

Further, Appellant referenced the Memorandum Opinion in his brief.

Counsel for the Appellant does not oppose the relief sought by the Motion.

For these reasons, Madison respectfully requests that it be granted leave to supplement the Index of Record on Appeal.

Respectfully submitted,

/s/ Roger G. Jones

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**CERTIFICATE OF FILING AND SERVICE**

I certify that on March 27, 2014, I served a copy of the foregoing with the Clerk of the Court and registered parties using the CM/ECF system

/s Roger G. Jones  
*Counsel for Appellee Madison Capital Company,*  
*LLC*